

BWW#: VA-330195

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:

ALVIN D. KELLEY

AKA ALVIN DANIEL KELLEY

Debtors

Case No. 17-34738-KRH

Chapter 13

RESPONSE TO DEBTORS' OBJECTION TO PROOF OF CLAIM 6-1

COMES NOW, Wells Fargo Bank, N.A., ("Respondent"), by and through counsel, and responds to Debtors' Objection to Proof of Claim (the "Objection") as follows:

1. Respondent is a mortgage lender/servicer.
2. Respondent filed Proof of Claim number 6-1 ("Claim 6-1") on November 13, 2017, listing a total secured debt in the amount of \$130,546.28, and pre-petition arrears of \$3,588.30.
3. The deadline to file Proofs of Claim was February 7, 2018.
4. On or about February 21, 2018, the Joint Debtor, Lisa M. Kelley aka Lisa Maria Kelley, was dismissed from this case.
5. Lisa M. Kelley, is sole obligor under the Note and Deed of Trust securing Claim 6-1.
6. The Respondent does not oppose the Debtor's objection to Claim 6-1 and is preparing to withdraw its filed Proof of Claim.

WHEREFORE, the Respondent prays that this Court will afford the Respondent the opportunity to timely withdraw its filed Proof of Claim.

Dated: January 22, 2019

Respectfully Submitted,
BWW Law Group, LLC

/s/ Karl Anthony Moses, Jr.
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CERTIFICATE OF SERVICE

I certify that on this 22nd of January, 2019, the following person(s) were or will be served a copy of the foregoing Response to Objection to Proof of Claim via the CM/ECF system or by first class mail, postage prepaid:

Carl M. Bates
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/s/Karl Anthony Moses, Jr.
Karl A. Moses, Jr.